

MACDONALD | FERNANDEZ LLP

Iain A. Macdonald (SBN 051073)

Alexander K. Lee (SBN 293724)

221 Sansome Street, Third Floor

San Francisco, CA 94104-2323

Telephone: (415) 362-0449

Facsimile: (415) 394-5544

Attorneys for Creditor,

U.S. TelePacific Corp. dba TPx Communications

UNITED STATES BANKRUPTCY COURT

NORTHERN DISTRICT OF CALIFORNIA

In Re:

PG&E CORPORATION,

-and-

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

Case No. 19-30088-DM

Chapter 11

(Lead Case) (Jointly Administered)

**NOTICE OF EXHIBITS TO BE
PRESENTED AT THE CONFIRMATION
HEARING IN SUPPORT OF U.S.
TELEPACIFIC CORP. DBA TPX
COMMUNICATIONS' OBJECTION TO
PLAN SUPPLEMENT IN CONNECTION
WITH DEBTORS' AND SHAREHOLDER
PROONENTS' JOINT CHAPTER 11
PLAN OF REORGANIZATION DATED
MARCH 16, 2020**

Date: May 27, 2020

Time: 10:00 a.m.

Place: 450 Golden Gate Ave.,
Crtrm 17, 16th Flr.
San Francisco, CA

Honorable Dennis Montali

NOTICE IS HEREBY GIVEN that the following exhibits will be presented by Creditor U.S. TelePacific Corp. doing business as TPx Communications (hereinafter "U.S. TelePacific") at the Confirmation Hearing of the above Debtors on May 27, 2020 at 10 a.m. in support of U.S. TelePacific's Objection to Plan Supplement in Connection with Debtors' and Shareholder Proponents' Joint Chapter 11 Plan of Reorganization Dated March 16, 2020 filed herein (Dkt. 7301):

1 1. March 11, 2015, Master Service Agreement (the “MSA”) and an Addendum to
2 Master Service Agreement (“Addendum”) entered into between U.S TelePacific and Pacific Gas and
3 Electric Company doing business as PG&E Corporation to provide high quality and extensive IDM,
4 internet and related services. Filed as **Exhibit 1** to Declaration Jeffrey Neal, Dkt. 7301-1.

5 2. August 17, 2018 Addendum to the Telecommunications Account Agreement – Multi-
6 Location Renewal (the “Renewal”) entered into between U.S. TelePacific and PG&E Corporation,
7 acting on PG&E Corporation’s behalf and on behalf of Pacific Gas and Electric Corporation (the
8 original customer). Filed as **Exhibit 2** to Declaration Jeffrey Neal, Dkt. 7301-1.

9 3. January 31, 2019 invoice showing the balance due to U.S. TelePacific in the amount
10 of \$108,749.87. Filed as **Exhibit 3** to Declaration Jeffrey Neal, Dkt. 7301-1.

11 4. U.S. TelePacific’s spreadsheet showing calculation of the total cure amount as of
12 May 15, 2020 is \$172,402.21. A true and correct copy is attached hereto as **Exhibit 4**.

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15 DATED: May 18, 2020

MACDONALD FERNANDEZ LLP

16 By: /s/ Iain A. Macdonald.
17 Iain A. Macdonald,
18 Attorneys for Creditor,
19 U.S. TelePacific Corp.
20 dba TPx Communications
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EXHIBIT 4

U.S. TELEPACIFIC'S CALCULATIONS DETERMINING THE CURE AMOUNT

As of May 15, 2020, the Debtors would need to pay \$172,402.21: the proof of claim amount (\$75,627.86, including the 503(b)(9) amount, as shown by the two entries in the "adjustments" column), plus the invoiced by not-yet-paid administrative claim (\$42,774.35 on the April 2020 invoice, with payment due at the end of May 2020), plus accrued but unbilled amounts that will be shown on the not-yet-issued May 29, 2020 invoice (approx. \$54,000.00).

Invoice Date	Amount	Payments	Adjustments	Forward	Current charge	Amount Due
1/19/2019	42,153.52	9,557.58	0.00	51,711.10	57,038.77	108,749.87
2/28/2019	108,749.87	-33,122.01	-50,217.44	25,410.42	56,161.28	81,571.70
3/31/2019	81,571.70	-56,161.28	0.00	25,410.42	57,665.87	83,076.29
4/30/2019	83,076.29	-57,665.87	0.00	25,410.42	54,488.97	79,899.39
5/31/2019	79,899.39	-54,488.97	0.00	25,410.42	53,776.35	79,186.77
6/30/2019	79,186.77	-53,776.35	0.00	25,410.42	59,382.82	84,793.24
7/31/2019	84,793.24	-59,382.82	0.00	25,410.42	61,896.23	87,306.65
8/31/2019	87,306.65	-61,896.23	-25,410.42	0.00	62,441.17	62,441.17
9/30/2019	62,441.17	-62,441.17	0.00	0.00	58,942.03	58,942.03
10/31/2019	58,942.03	-58,942.03	0.00	0.00	54,220.17	54,220.17
11/30/2019	54,220.17	-54,220.17	0.00	0.00	50,629.69	50,629.69
12/31/2019	50,629.69	-50,629.69	0.00	0.00	56,593.30	56,593.30
1/31/2020	56,593.30	-56,593.30	0.00	0.00	69,088.20	69,088.20
2/29/2020	69,088.20	-69,088.20	0.00	0.00	58,625.30	58,625.30
3/31/2020	58,625.30	-58,625.30	0.00	0.00	50,610.25	50,610.25
4/30/2020	50,610.25	-50,610.25	0.00	0.00	42,774.35	42,774.35